

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

**TRENK, DiPASQUALE, WEBSTER,
DELLA FERA & SODONO, P.C.**

347 Mt. Pleasant Avenue, Suite 300

West Orange, NJ 07052

(973) 243-8600

Richard D. Trenk (RT6874)

Counsel to Debtor and Debtor-in-Possession

In re:

Jeep Eagle 17, Inc., et al.,

Debtors.

Case No. 09-23708

(Jointly Administrated)

Honorable Donald H. Steckroth

Chapter 11

Recommended Local Form:

☒ Followed

☐ Modified

**APPLICATION FOR RETENTION OF SPECIAL COUNSEL
AND CERTIFICATE OF COMPLIANCE WITH D.N.J. LBR 2014-1(a)**

1. The applicant, Leigh Rzasa-Ormes, is the:

☐ Trustee: ☐ Chap. 7 ☐ Chap. 11 ☐ Chap. 13.

☒ Debtor: ☒ Chap. 11 ☐ Chap. 13

☐ Official Committee of _____

2. The applicant seeks to retain Tobin, Koster, Olechna, Reitman, Greenstein & Konray to serve as:

☐ Attorney for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of _____

☐ Accountant for: ☐ Trustee ☐ Debtor-in-possession

☐ Official Committee of _____

☒ Other Professional:

☐ Realtor ☐ Appraiser ☒ Special Counsel

☐ Auctioneer ☐ Other (specify): _____

3. The employment of the professional is necessary because the Debtor requires special malpractice litigation legal counsel to perform the required legal services during the pendency of the case.
4. The professional has been selected because of their considerable experience in the field of malpractice matters. The Debtor-In-Possession believes that Tobin, Koster, Olechna, Reitman, Greenstein & Konray is well qualified to represent it as special counsel in this Chapter 11 proceeding because Tobin, Koster, Olechna, Reitman, Greenstein & Konray has been retained to represent the Debtor-In-Possession in a related malpractice proceeding captioned Leigh Rzasa-Ormes v. Giblin & Giblin, Paule J. Giblin, Esq., Paul J. Giblin, Jr., Esq. and Brian T. Giblin, Esq. Docket No. BER-L-1073-07 ("Malpractice Action") and Leigh Rzasa-Ormes v. Joseph S. Aboyoun, Esq., John Doe 1-10 and XYZ Company Docket No. ESX-L-6311-06 ("Malpractice Action"). These actions were pending in the Superior Court of New Jersey before the filing the Chapter 11 petition.
5. The professional services to be rendered are as follows:

Representation of Debtor-In-Possession, in the Malpractice Action and related issues as may be necessary and appropriate herein.
6. The proposed arrangement for compensation is as follows:

The fees charged by Tobin, Koster, Olechna, Reitman, Greenstein & Konray in connection with the malpractice action shall comprise at a contingency of one-third (1/3) of any settlement or recovery realized for the Debtor after reimbursement for all out-of-pocket costs and expenses. Services of George

Allison, whether paralegal or legal in nature, shall be considered an out-of-pocket expense billed at \$65 per hour.

7. To the best of the applicant's knowledge, the professional's connection with the debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☒ None

☐ Describe connection:

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. § 101(14).

☒ does not represent or hold any interest adverse to the debtors or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☐ Other; explain:

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows:

Wherefore, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Dated: June 11, 2009

By: /s/ Leigh Rzasa Ormes
Leigh Rzasa Ormes, Managing Member

Jeep Eagle 17, Inc.
Name of Applicant

- and -

**TRENK, DiPASQUALE, WEBSTER,
DELLA FERA & SODONO, P.C.**
Counsel to Debtor and Debtor-in-Possession

By: /s/ Richard D. Trenk
Richard D. Trenk

CERTIFICATE OF COMPLIANCE WITH D.N.J. LBR 2014-1(a)

I have complied with D.N.J. LBR 2014-1(a) by mailing a copy of this application to all the following who did not receive electronic notice from the Court: the United States Trustee, the Debtor and/or Debtor's attorney, the Trustee (as applicable), the secured creditors, the Official Committees (as applicable), the twenty (20) largest unsecured creditors (as applicable), and others requesting notice, all of whose addresses are shown on the attached service list, by overnight mail, postage prepaid, within one (1) day after filing with the Court.

Dated: June 11, 2009

Signed: /s/ Richard D. Trenk
Richard D. Trenk

SERVICE LIST

VIA FIRST CLASS MAIL

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Newark, NJ 07102

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